

27.080 White-Rodgers

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office
8460 Watson Road, Suite 217
St. Louis, MO 63119
314-849-1313

April 20, 1990

Mr. Henry Dempsey
White-Rodgers Division
9797 Reavis Road
St. Louis, MO 63123

Dear Mr. Dempsey:

L.O.W. #90-SL.017

Enclosed, please find a report of an inspection conducted on April 4, 1990, by Mr. Greg Krueger of my staff. The section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection. The "RECOMMENDATIONS" outline the steps that will correct those violations.

To document that corrective actions have been taken, you are requested to submit a written response no later than May 21, 1990. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to Mr. Krueger's attention. You should also forward a copy of your response and supporting documentation to Mr. Tom Judge - Hazardous Waste Enforcement, Waste Management Program, P.O. Box 176, Jefferson City, Missouri 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Sincerely,

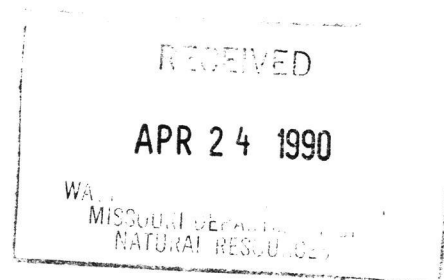
ST. LOUIS REGIONAL OFFICE

Robert S. P. Eck
Regional Administrator

RSPE/GK/cc

Enclosure

cc: CO-WMP ✓



R00081177
RCRA Records Center

RESOURCE CONSERVATION & RECOVERY
and
MISSOURI HAZARDOUS WASTE MANAGEMENT
COMPLIANCE EVALUATION INSPECTION REPORT

Facility:

White-Rodgers Division
Emerson Electric Company
9797 Reavis Road
St. Louis, MO 63123
(314) 577-1346

EPA ID #: MOD 092357821
Missouri ID: 1422

Participants:

Missouri Department of Natural Resources
St. Louis Regional Office (MDNR-SLRO)

Mr. Greg Krueger
Environmental Engineer

White-Rodgers Division
Emerson Electric Company

Mr. Henry Dempsey
Manufacturing Engineer

Ms. Debra Bene
Manager of Manufacturing Engineer

Introduction:

An inspection of White-Rodgers, located at 9797 Reavis Road, St. Louis, Missouri 63123 was conducted on April 4, 1990. The inspection was conducted under authority of the Resource Conservation and Recovery Act of 1976 and Section 260.377 and 260.375(9) of the Missouri Hazardous Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

Facility Description:

White-Rodgers Division of Emerson Electric Company is a manufacturer of thermostats and electronic devices for controlling heating and cooling systems. They employ approximately 750 people, operating 40 hours per week. The facility was inspected as a large quantity generator.

Hazardous Waste streams generated at the facility are as follows:

1. 1,1,1-Trichloroethane: The facility has two (2) vapor degreasers for the cleaning of parts. These degreasers are connected to closed loop distillation units to reclaim 1,1,1, Trichloroethane. Hazardous waste 1,1,1, Trichloroethane is generated from the still bottoms of the distillation units and is shipped off-site with an EPA ID Number of D001.
2. Xylene, Petroleum Naptha and Ethylene glycol are generated as a by-product from the production and assembly of the facility's product.
3. Paint sludges and Toluene are generated from the facility's spray painting operations.
4. Hydrochloric acid and sodium hydroxide are generated within the facility's maintenance department.

5. As part the manufacturing process, parts that have been soldered are cleaned with freon. This freon which contains flux and solder is distilled in a closed loop distillation unit and still bottoms are generated as a waste stream. After the parts have been cleaned with freon, they are dipped in a humiseal solution for moisture protection. The humiseal has a small amount of Xylene in it and the waste generated by this process is mixed with the freon still bottoms. This waste is currently shipped off-site with an EPA ID Number of D001.
6. Metal parts and waste from the screw machine and stamping operations have an oil coating from the process. These parts are placed in a centrifuge and the oil is removed and pumped into a waste oil holding tank outside with a 1000 gallon capacity. Waste oil generated in the maintenance department is placed in this same waste oil holding tank. This waste is currently shipped off-site with an EPA ID Number of D098.

The following amounts of waste were shipped off-site during 1989 and their corresponding EPA ID#'s:

Waste Oil	13,940 gallons	EPA ID#	D098
Waste Sodium Hydroxide	770 gallons	EPA ID#	D002
Waste Acid	245 gallons	EPA ID#	D002
Waste Ignitable Liquid	165 gallons	EPA ID#	D001
Waste Ignitable Liquid	55 gallons	EPA ID#	F003

Six (6) different transporters were utilized during 1989:

Heritage Transport
Envir-All, Inc.
Professional Ecology, Inc.
Schiber Truck Co., Inc.
Superior Equipment
CTC Industrial Services

Five (5) different facilities were utilized during 1989 for resource recovery of the facilities hazardous waste:

American Resource Recovery
901 E. Bodley
Memphis, TN 38106

Heritage Enviromental Services
7901 W. Morris Street
Indianapolis, IN 46321

Interstate Environmental Services
6300 Stadium Drive
Kansas City, MO 64129

Continental Cement Company, Inc.
Highway 79 South
Hannibal, MO 63401

River Cement Company, Inc.
Selma Plant
Festus, MO 63028

Unsatisfactory Features:

1. Manifests did not include land disposal restriction notifications, or treatment standards for restricted waste, in violation of 40 CFR 268.7
2. Failure to properly identify the facility's hazardous waste streams, in violation of 261.30(c), incorporated by reference in 10 CSR 25-4.261.
3. Failure to submit a summary manifest report within 45 days after the end of each calendar quarter, in violation of 10 CSR 25-5.262(2)(D)1.
4. Failure to have a complete contingency plan, in violation of 40 CSR 265.51, incorporated by reference in 10 CSR 25-5.262(2)(C)2.
5. Failure to have a complete personnel training program for individuals that conduct hazardous waste activities, in violation of 40 CFR 265.16, incorporated by reference in 10 CSR 25-5.262(2)(C)2.
6. Failure to properly label the hazardous waste containers in the storage area, in violation 40 CFR 262 Subpart C, incorporated by reference in 10 CSR 25-5.262(2)(C)1.
7. The base of the hazardous waste storage area was not impervious to contain leaks or spills, in violation of 10 CSR 25-5.262(2)(C)2.B.(III)(a).

Comments:

On April 4, 1990, an inspection was conducted by Mr. Greg Krueger of the Department of Natural Resources on White-Rodgers Division of Emerson Electric Company. Mr. Henry Dempsey and Ms. Debra Bene were present and represented the company. An opening conference was held at which time the facility records were reviewed. A facility tour was conducted and a closing conference was held to review violations observed during the inspection.

A land disposal restriction notifications and treatment standards should be sent with all manifests that accompany offsite shipments of hazardous waste restricted from land disposal. A copy of this notification should be kept on file within the facility's records.

Manifest number 0189, dated 03/27/90, for an offsite shipment of waste oil with an EPA ID number of D098 did have a land disposal restriction notification accompanying it. This land disposal restriction indicated the presents of Xylene, acetone and methyl ethyl ketone. However, no information was on file at the facility to explain why this was done. This waste should be analyzed for the presents of the solvents indicated on the land disposal notification. Any waste containing solvents of this type would have an EPA ID number from the F-list as explained in 40 CFR 261.31.

The facility generates hazardous waste from the still bottoms of three (3) different distillation units. This waste contains 1,1,1-Trichloroethane from two (2) units and freon from one (1) unit. The facility has incorrectly identified these waste streams with an EPA ID Number of D001. Hazardous Waste containing 1,1,1-Trichloroethane from a distillation unit would have an EPA ID Number of F001. Hazardous Waste containing freon from a distillation unit would have an EPA ID Number of F002, however, since xylene is mixed with this waste stream the correct EPA ID Number would be F002/F003.

Summary manifest reports for each calendar quarter were completed and mailed to the department, as a package of four (4) quarters, once a year. Each individual quarterly report should be mailed to the department within 45 days after the end of each quarter.

The facility has an emergency response team, safety equipment, evacuation plan and fire fighting equipment. However, a formal contingency plan should be developed and made available to all employees. The contingency plan should contain all procedures that an employee should take in the case of an Emergency or hazardous waste release, names, addresses and phone numbers (office and home) of all persons qualified to act as an emergency coordinator, detailed list of all emergency equipment at the facility along with each items physical description and location. A copy of this plan should be forwarded to all local emergency response teams, including the local fire department, hospital and police department.

The facility has a personnel training program for all their employees. However, this program should be expanded to include hazardous waste management practices and the contingency plan for all individuals that conduct hazardous waste activities. This training should state who gives the training and their qualifications. Documentation should be kept on file to show what type of training was given, who received the training and a description of the employees position. A minimum of an annual review of this training is required.

The hazardous waste storage area contained eleven 55 gallon drums, two 30 gallon carboys and four 5 gallon containers. All of these containers were marked with a number that is used for identifying the barrel's contents by the facility's internal numbering system. All hazardous waste storage containers should be labeled during the entire onsite storage with a minimum of the words hazardous waste, the generators name and address, proper Department of Transportation markings and the accumulation start date.

The hazardous waste storage is fenced, locked and has a concrete containment area. The concrete floor has several cracks that might allow any spills or release of waste to contaminate the environment. All cracks in this floor should be repair so that any spill or release would be contained within the containment area.

Recommendations:

1. Include land disposal restriction notifications and treatment standards with offsite shipments of hazardous waste that are restricted from land disposal. Retain a record within the facilities files that this has been done.
2. Perform a waste analysis on the facility's waste oil stream to identify if solvents are present. Use the correct EPA ID Numbers for the waste generated from the distillation units.
3. Submit all quarterly summary manifest reports within 45 days after the end of each calendar quarter.
4. Develop a complete contingency plan and provide documentation to MDNR that this has been done. Forward a copy of this plan to all local emergency response teams and to the MDNR.

5. Expand the personnel training program to include hazardous waste management for all individuals that conduct hazardous waste activities. Provide documentation to MDNR that this has been done.
6. Properly label all hazardous waste storage containers.
7. Repair the cracks in the floor of the hazardous waste storage area.

PREPARED BY:



Greg Krueger
Environmental Engineer
St. Louis Regional Office

LARGE QUANTITY GENERATOR CHECKLIST

Form LQG-INSP
(10-15-88)Name of Facility: White RodgersDate: 4/4/90Address: 9797 Reavis RdOther Inspections Done:
RR TRANS LDR
OTHER St. Louis MO 63123Phone: (314) 577 1346 MO ID# 1422EPA ID# MO6092357821Facility Representative: Henry DempseyTitle: Manufacturing Eng.

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

Manufacture thermostats, electronic devices for controlling
heating and cooling systems.

List of wastes generated. (Use continuation sheet, if needed.)

	<u>Waste</u>	<u>Amount/Month</u>	<u>Disposition</u>
1.	<u>WASTE oil</u>	<u>1050 gal</u>	<u>RR</u>
2.	<u>Still Bottoms (solvents)</u>	<u>See report</u>	<u>RR</u>
3.	<u>hydrochloric Acid</u>	<u>245 gal/yr</u>	<u>RR</u>
4.	<u>Sodium hydroxide</u>	<u>770 gal/yr</u>	<u>RR</u>
5.			

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. (✓)
Manifest document number (MO I.D. & Shipment #). (✓)
EPA Waste I.D. codes (✓)
Generator's name, address, phone # (✓)
All Transporters' names, phone #'s, MO and EPA I.D. #'s. (✓)
Designated facility name, address, phone # and MO and EPA I.D. # (✓)
Proper DOT Shipping Name, Hazard Class and I.D. # (✓)
Containers, Quantity and Unit Wt/Vol being shipped properly designated. (✓)
Proper certification including waste minimization. (KB) (✓)
Manifest properly signed and dated (✓)
No more than 10 days time between generator and facility signatures. (✓)
Manifests returned within 35 days. (✓)
If not, exception generator report submitted within 45 days. (✓)
Completed manifests and Summary Manifest Report and Certification. (✓)
Spills of reportable quantities reported to DNR. (✓)

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. (✓)
Placards available for use by transporters (✓)
Satellite accumulation requirements met (if applicable). (✓)
a. Stored in satellite areas less than 1 year. (✓)
b. Containers marked identifying contents and beginning date (✓)
c. Containers kept closed/compatible/good condition. (✓)
d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely haz. waste). (✓)

C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Facility inspected and maintained. (✓)
Date of accumulation marked. (✓)
Storage less than 90 days (unless small quantity generator). (✓)

D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(2)(C)2

Containers in good condition (✓)
Containers kept closed in storage. (✓)
Containers storing incompatible waste separated or protected from each other. (✓)
Containers of ignitable or reactive waste stored > 50 feet from property line (✓)
Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B. (✓)

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.
(See tank checklist)

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. ☒
Completed classroom or on-the-job training. ☒
Job title, description, and name of person filling position ☒
Written record of the type and amount of training given ☒
Documentation confirming that training has been given ☒

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. ☒
Device in the hazardous waste operation area capable of summoning emergency assistance. ☒
Fire control, spill control, and decontamination equipment available. . . ☒
Adequate water supply for fire control equipment. ☒
Adequate and proper safety equipment available. ☒
Adequate aisle space. ☒
Arrangements with local emergency agencies. ☒

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. ☒
Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. ☒
Describe formal arrangements with emergency agencies. ☒
Name, addresses, and phone numbers (home & office) of emergency coordinators. ☒
Emergency equipment including its description and location. ☒
Evacuation plan if applicable ☒

I. WASTE OIL 10 CSR 25-11.010

Written waste oil contract maintained ☒
Waste oil properly stored and transported ☒

COMMENTS: _____

Inspector Signature & Title: _____

Office: _____

IN COMPLIANCE ☒

IN VIOLATION OR
ABSENT ☒